

EXHIBIT A

RENEE BLACKWELL

IN THE UNITED STATES DISTRICT COURT

DISTRICT OF NEW JERSEY

(Camden Vicinage)

RENEE BLACKWELL, : CIVIL ACTION
Plaintiff :

vs :

STATE OF NEW JERSEY :

and :

NEW JERSEY DEPARTMENT OF :

CHILDREN AND FAMILIES, :

DIVISION OF YOUTH AND :

FAMILY SERVICES :

and :

CHRISTINE MOZES, :

INDIVIDUALLY AND IN HER :

OFFICIAL CAPACITY AS :

DIRECTOR OF DIVISION OF :

YOUTH AND FAMILY SERVICES :

and :

KIMBERLY RICKETT [sic], :

INDIVIDUALLY AND IN HER :

OFFICIAL CAPACITY AS :

COMMISSIONER OF NEW JERSEY :

DEPARTMENT OF CHILDREN AND :

FAMILIES :

and :

DOLORES HELB, INDIVIDUALLY :

AND IN HER OFFICIAL :

CAPACITY AS AN EMPLOYEE OF :

NEW JERSEY DEPARTMENT OF :

CHILDREN AND FA MILES :

and :

DEBRA BOEHME, INDIVIDUALLY :

AND IN HER OFFICIAL :

CAPACITY AS AN EMPLOYEE OF :

NEW JERSEY DEPARTMENT OF :

CHILDREN AND FAMILIES :

and :

<p style="text-align: right;">6</p> <p>1 RENEE BLACKWELL</p> <p>2 (It is hereby stipulated and</p> <p>3 agreed by and among counsel for the</p> <p>4 respective parties that sealing,</p> <p>5 certification, and filing are waived</p> <p>6 and that all objections, except as to</p> <p>7 the form of the question, be reserved</p> <p>8 until the time of trial.)</p> <p>9 RENEE BLACKWELL, after having</p> <p>10 been first duly sworn, was examined and</p> <p>11 testified as follows:</p> <p>12 * * *</p> <p>13 EXAMINATION</p> <p>14 * * *</p> <p>15 BY MS. JORDAN:</p> <p>16 Q. Good morning, Ms. Blackwell. My</p> <p>17 name is Karen Jordan. I'm an attorney for the</p> <p>18 State defendants in this case, who include the</p> <p>19 State of New Jersey, the Department of Children</p> <p>20 and Families, Division of Youth and Family</p> <p>21 Services, Kimberly Ricketts, Christine Mozes,</p> <p>22 Barbara Parnes, and Debra Boehme.</p> <p>23 I'm going to start with some</p> <p>24 instructions on the nature of this proceeding</p> <p>25 and -- just some instructions on how -- how we</p>	<p style="text-align: right;">8</p> <p>1 RENEE BLACKWELL</p> <p>2 assumed that you understood it and heard it.</p> <p>3 A. Okay.</p> <p>4 Q. I don't want you to speculate or</p> <p>5 guess on answers, but if you can make an</p> <p>6 estimate, I would like you to try to do that,</p> <p>7 if you don't know the specific answer.</p> <p>8 A. Okay.</p> <p>9 Q. Is there anything -- any others?</p> <p>10 I guess that's pretty much it.</p> <p>11 If I think of any more, I'll -- I'll -- I'll</p> <p>12 tell you what the other instructions are.</p> <p>13 A. Okay.</p> <p>14 Q. Did you talk with your attorney</p> <p>15 before this deposition? This is a yes-or-no</p> <p>16 answer.</p> <p>17 A. Yes.</p> <p>18 Q. Okay. Did you look at any</p> <p>19 documents to prepare for the deposition?</p> <p>20 A. No.</p> <p>21 Q. Okay. Did you bring any</p> <p>22 documents with you today?</p> <p>23 A. I brought the original letter</p> <p>24 that I sent to Mr. Friedman.</p> <p>25 Q. Who is Mr. Friedman?</p>
<p style="text-align: right;">7</p> <p>1 RENEE BLACKWELL</p> <p>2 should go forward.</p> <p>3 A. Can you speak up just a little</p> <p>4 bit?</p> <p>5 Q. Sure.</p> <p>6 This is a deposition for me and</p> <p>7 the other parties to find out the facts of the</p> <p>8 case.</p> <p>9 A. Um-hmm.</p> <p>10 Q. It's a discovery deposition.</p> <p>11 You are sworn, and it has the same effect as if</p> <p>12 you were testifying in court. So you're under</p> <p>13 oath.</p> <p>14 All your answers have to be</p> <p>15 audible -- that means they have to be out</p> <p>16 loud -- because the court reporter is taking</p> <p>17 them down --</p> <p>18 A. Okay.</p> <p>19 Q. -- and she can't take down if</p> <p>20 you shake your head or something like that.</p> <p>21 A. Okay.</p> <p>22 Q. If I ask you a question and you</p> <p>23 don't understand the question or don't hear it</p> <p>24 because I am soft spoken, please tell me that.</p> <p>25 If you go ahead and answer it, it will be</p>	<p style="text-align: right;">9</p> <p>1 RENEE BLACKWELL</p> <p>2 A. He was the original attorney</p> <p>3 before my referral.</p> <p>4 Q. Okay. That's confidential, so I</p> <p>5 wouldn't want to see that.</p> <p>6 A. Okay.</p> <p>7 Q. This lawsuit is about your claim</p> <p>8 that the Division gave out information that was</p> <p>9 confidential. When was your first contact</p> <p>10 about that information with the Division of</p> <p>11 Youth and Family Services or the State?</p> <p>12 A. The Tuesday -- the Tuesday after</p> <p>13 the 13th.</p> <p>14 Q. 13th of what month and what</p> <p>15 year?</p> <p>16 A. December of '08.</p> <p>17 Q. [REDACTED] before</p> <p>18 [REDACTED]</p> <p>19 A. [REDACTED]</p> <p>20 Q. [REDACTED]</p> <p>21 A. [REDACTED]</p> <p>22 Q. [REDACTED] was that letter?</p> <p>23 A. [REDACTED] August of '08.</p> <p>24 Q. Okay. And what -- what did that</p> <p>25 [REDACTED] letter say?</p>

3 (Pages 6 to 9)

14

1 RENEE BLACKWELL

2 Q. Yes.

3 A. I would assume -- they both left

4 the porch and got back in the -- I think it was

5 a black SUV.

6 Q. Okay. Did Denine ever contact

7 you again?

8 A. I've never heard from her since

9 then.

10 Q. Okay. When did you next talk to

11 anybody about Denine's search for her

12 biological mother?

13 A. The following Tuesday. Okay?

14 Monday, I tried all day to get in touch with

15 Ms. Helb. I was unable to get in touch with

16 Ms. Helb. I did not leave a message. I wanted

17 to speak to someone.

18 On Tuesday, I left a message and

19 got a return phone call from Barbara Parnes on

20 my cell phone.

21 Q. And what was that conversation?

22 A. I explained what happened on

23 Saturday, and Ms. Parnes explained to me that

24 because we did not hear from you, we

25 essentially went on and did what we had to do.

15

1 RENEE BLACKWELL

2 At that same conversation, I --

3 I asked her -- I said, you didn't have any type

4 of authorization from me, no permission

5 whatsoever. She said, no, we just went on and

6 did what we had to do.

7 She further stated that, as a

8 matter of fact, your biological daughter,

9 Jenine, is speaking with Denine right now.

10 That was a Tuesday.

11 I asked, what number -- what

12 number did you give my daughter; what number

13 are you using? She gave me a number. I

14 believe it began with a nine. It was not a

15 familiar number. And I became very upset.

16 Q. This was Jenine's number

17 starting with a nine?

18 A. She said that it was Jenine's

19 number. Ms. Parnes said it was Jenine's

20 number. Jenine is my daughter biological.

21 It's J-e-n-i-n-e. And, ironically, the adopted

22 daughter is Denine.

23 Q. So when Ms. Parnes or Parnes

24 said to you, we did what we had to do, what did

25 that mean to you?

16

1 RENEE BLACKWELL

2 A. I mean that regardless of

3 what she might have returned the letter, the State

4 went on and disclosed my information anyway.

5 Q. Did she say that to you?

6 A. No, she didn't.

7 Q. Had you talked to Jenine about

8 this before -- before -- well, let's start

9 with, before the day that Denine came to your

10 door --

11 A. No.

12 Q. -- had you talked to Jenine?

13 A. No.

14 Q. How about before you spoke to

15 Ms. Parnes?

16 A. Did I speak to

17 Ms. Parnes about --

18 Q. Did you speak to Jenine before

19 you spoke to Ms. Parnes --

20 A. No.

21 Q. -- before this conversation, you

22 just discussed it?

23 A. No.

24 Q. Did you speak to Jenine after

25 that?

17

1 RENEE BLACKWELL

2 A. No.

3 Q. Did you speak to Jenine at any

4 time when your biological daughter gave up

5 for adoption?

6 A. Later on. Much later on.

7 I was not aware that she had spoken to Denine.

8 She never disclosed it to me.

9 Q. When you say, "later on," when

10 did you first discuss this issue with your

11 daughter Jenine?

12 A. When she was about a month old.

13 Q. Okay. And when was that, if you

14 can give me a month?

15 A. It's going to be very difficult.

16 It's going to be very difficult.

17 Q. And what was that conversation

18 when you had that first conversation with

19 Jenine?

20 A. It was through an email that my

21 daughter sent to me, that she had spoken with

22 Denine and she felt that -- I printed the email

23 out; I don't know what it was -- she felt

24 that -- she just wants to know you; perhaps --

25 I'm not too sure about the

5 (Pages 14 to 17)

<p style="text-align: right;">22</p> <p>1 RENEE BLACKWELL</p> <p>2 old were you?</p> <p>3 A. You would have to subtract her</p> <p>4 present age from 64, and that's the way you'd</p> <p>5 have to come up with it.</p> <p>6 Q. Okay. Did you have any other</p> <p>7 children at the time?</p> <p>8 A. I had two.</p> <p>9 Q. And what were their ages?</p> <p>10 A. They were toddlers, maybe 4 or 5</p> <p>11 years old. They were toddlers.</p> <p>12 Q. Was one of those children</p> <p>13 Jenine?</p> <p>14 A. Jenine was one.</p> <p>15 Q. And what was the name of the</p> <p>16 other children?</p> <p>17 A. Sammy, Sammy.</p> <p>18 Q. Were you married at the time?</p> <p>19 A. No, I've never been married.</p> <p>20 Q. Were you working at the time?</p> <p>21 A. No, I don't think so.</p> <p>22 Q. Did you have any kind of income</p> <p>23 at that time?</p> <p>24 A. Medicaid, probably, for a year.</p> <p>25 Q. Were you on welfare at that</p>	<p style="text-align: right;">24</p> <p>1 RENEE BLACKWELL</p> <p>2 Did you report the rape to</p> <p>3 anybody?</p> <p>4 A. No.</p> <p>5 Q. Did you talk to anyone in your</p> <p>6 family about it?</p> <p>7 A. When I became pregnant, yes.</p> <p>8 Q. Who did you talk to about it?</p> <p>9 A. Josie and my mother.</p> <p>10 Q. Who is Josie?</p> <p>11 A. Josie Hollingsworth is my aunt</p> <p>12 by marriage, and she works for the</p> <p>13 children of -- at that time, she worked for the</p> <p>14 State. She worked DYFS.</p> <p>15 Q. Where does she live right now?</p> <p>16 A. Mays Landing.</p> <p>17 Q. Do you have her address?</p> <p>18 A. At home.</p> <p>19 Q. Could you provide it to your</p> <p>20 attorney?</p> <p>21 MS. JORDAN: And I'll ask that</p> <p>22 you provide that address.</p> <p>23 MR. BAIRD: We will do that.</p> <p>24 BY MS. JORDAN:</p> <p>25 Q. And did you say your mother</p>
<p style="text-align: right;">23</p> <p>1 RENEE BLACKWELL</p> <p>2 time?</p> <p>3 A. Yes.</p> <p>4 Q. Were you living with your aunt</p> <p>5 at that time, when Denine was born?</p> <p>6 A. No. I had moved out and gotten</p> <p>7 my own place.</p> <p>8 Q. Who lived in that home?</p> <p>9 A. Who lived in that home?</p> <p>10 Q. Who lived there, yes.</p> <p>11 A. My two children and myself, the</p> <p>12 apartment.</p> <p>13 Q. Did you know Denine's father</p> <p>14 before -- you allege that he raped you. Did</p> <p>15 you know him before that?</p> <p>16 A. Yes.</p> <p>17 Q. How did you know him?</p> <p>18 A. I met him in the street, at a</p> <p>19 bar, probably. Yes.</p> <p>20 Q. How long did you know him?</p> <p>21 A. Off and on, for maybe a year.</p> <p>22 Q. And did you continue to have a</p> <p>23 relationship with him after --</p> <p>24 A. No.</p> <p>25 Q. -- the rape?</p>	<p style="text-align: right;">25</p> <p>1 RENEE BLACKWELL</p> <p>2 also?</p> <p>3 A. Yes.</p> <p>4 Q. Where is she living now?</p> <p>5 A. Jeffries Towers in Atlantic</p> <p>6 City.</p> <p>7 Q. Okay. I'm also going to make</p> <p>8 the same request for her address, unless you</p> <p>9 know it.</p> <p>10 A. 227 Vermont Avenue, Apartment</p> <p>11 907, Atlantic City, New Jersey.</p> <p>12 Q. Okay. How did -- was it</p> <p>13 about that you gave up Denine for</p> <p>14 adoption? How did that happen?</p> <p>15 A. It came about because I could</p> <p>16 not afford to care for her. With two toddlers,</p> <p>17 a single parent by choice, nine months to think</p> <p>18 about it -- I could not afford to care for</p> <p>19 her.</p> <p>20 Q. Okay.</p> <p>21 A. -- was it which she</p> <p>22 was adopted?</p> <p>23 Q. And what steps did you take so</p> <p>24 that she would be adopted?</p> <p>25 A. Spoke to my Aunt Josie.</p>

7 (Pages 22 to 25)

<p style="text-align: right;">30</p> <p>1 RENE E BLACKWELL</p> <p>2 Q. Have you had any treatment for</p> <p>3 those injuries?</p> <p>4 A. No.</p> <p>5 Q. Are you claiming --</p> <p>6 A. I have congestive heart failure.</p> <p>7 I have medication. I've been advised to have a</p> <p>8 pacemaker, which I refuse to have. But beat</p> <p>9 up, that type of thing, no, but she has, even</p> <p>10 now, completely infiltrated my life, even now,</p> <p>11 and I really do resent that.</p> <p>12 Q. Do you claim any physical injury</p> <p>13 as a result of this incident?</p> <p>14 A. Of this incident?</p> <p>15 Q. Um-hmm.</p> <p>16 A. No, I can't say that, not in</p> <p>17 truthful -- no.</p> <p>18 Q. Are you working now?</p> <p>19 A. Working?</p> <p>20 Q. Are you working?</p> <p>21 A. Every day.</p> <p>22 Q. Have you lost any work because</p> <p>23 of this incident?</p> <p>24 A. No, just times coming for</p> <p>25 attorney -- no.</p>	<p style="text-align: right;">32</p> <p>1 RENE E BLACKWELL</p> <p>2 A. Okay.</p> <p>3 Q. Have you ever spoken to</p> <p>4 Ms. Helb?</p> <p>5 A. No.</p> <p>6 Q. You spoke earlier about a letter</p> <p>7 that you received that she had written; is that</p> <p>8 right?</p> <p>9 A. Okay.</p> <p>10 Q. Do you remember that?</p> <p>11 A. Yes.</p> <p>12 Q. And you said you made attempts</p> <p>13 to call her on a Monday.</p> <p>14 A. Yes.</p> <p>15 Q. You never successfully reached</p> <p>16 her?</p> <p>17 A. Never.</p> <p>18 Q. Not just that Monday, but any</p> <p>19 time?</p> <p>20 A. Never.</p> <p>21 Q. Did you receive any other</p> <p>22 letters from her other than that one letter?</p> <p>23 A. No.</p> <p>24 Q. And was that letter on State of</p> <p>25 New Jersey letterhead?</p>
<p style="text-align: right;">31</p> <p>1 RENE E BLACKWELL</p> <p>2 Q. Okay. I'm just going to take a</p> <p>3 minute. I actually might be finished.</p> <p>4 A. Okay.</p> <p>5 Q. And then Mr. Mikulski will have</p> <p>6 the opportunity to question you.</p> <p>7 A. Okay.</p> <p>8 * * *</p> <p>9 (Pause)</p> <p>10 * * *</p> <p>11 BY MS. JORDAN:</p> <p>12 Q. Ms. Blackwell, in discovery, we</p> <p>13 provided a statement by Denine Harvey [sic] to</p> <p>14 your attorney. Have you seen that statement?</p> <p>15 A. No.</p> <p>16 MS. JORDAN: Okay. I think I'm</p> <p>17 finished.</p> <p>18 * * *</p> <p>19 EXAMINATION</p> <p>20 * * *</p> <p>21 BY MR. MIKULSKI:</p> <p>22 Q. Ms. Blackwell, good morning.</p> <p>23 A. Good morning.</p> <p>24 Q. My name is Mike Mikulski, and I</p> <p>25 represent Dolores Helb.</p>	<p style="text-align: right;">33</p> <p>1 RENE E BLACKWELL</p> <p>2 A. Yes.</p> <p>3 Q. From the Division of Youth and</p> <p>4 Family Services?</p> <p>5 A. Yes.</p> <p>6 Q. Have you ever received any other</p> <p>7 letters from Ms. Helb other than something on</p> <p>8 New Jersey letterhead?</p> <p>9 A. No.</p> <p>10 Q. [REDACTED] how Denine</p> <p>11 [REDACTED]</p> <p>12 A. [REDACTED] what I have just</p> <p>13 [REDACTED]</p> <p>14 Q. Okay. I don't want you to tell</p> <p>15 me what your attorneys have told you.</p> <p>16 A. No.</p> <p>17 Q. Okay. Tell me what you know,</p> <p>18 then.</p> <p>19 A. No, not from attorneys.</p> <p>20 Q. Okay.</p> <p>21 A. From my grandson.</p> <p>22 Q. Okay.</p> <p>23 A. [REDACTED] is 18 years old, and</p> <p>24 he said [REDACTED] that she had my</p> <p>25 [REDACTED] a piece of paper [REDACTED] State of</p>

9 (Pages 30 to 33)

38

1 RENEE BLACKWELL

2 Q. Okay. And did it come up with

3 your address?

4 A. Yes. I did. Atlantic City.

5 Public Library.

6 Q. Okay. You said a few minutes

7 ago that even today, Denine has -- and I think

8 I wrote it down -- infiltrated your life.

9 Could you tell me about that, what you mean by

10 that?

11 A. The way that -- if I were in her

12 position, the way that I would have handled

13 this would probably have been in a letter

14 format.

15 When I spoke to the first

16 attorney, Mr. Friedman, his advice was to --

17 Q. I can't -- I don't -- you can

18 voluntarily tell me that, but I'm not allowed

19 to ask you about advice that your lawyer has

20 given you.

21 A. Oh, okay.

22 She's essentially gone on and

23 contacted all members of my family -- I'll put

24 it to you like that --

25 Q. Okay.

39

1 RENEE BLACKWELL

2 A. -- knowing what -- how I feel

3 about it. Stamps are, like, 44 cents.

4 She has essentially, even this

5 past Saturday -- I found out that she was at my

6 mother's house this past Saturday with her

7 boyfriend.

8 I lost my son January 27th --

9 Q. I'm sorry to hear that.

10 A. -- and she went to the hospital

11 to see him.

12 She was across the street at my

13 house two Thursdays ago. They had a

14 candlelight vigil for my son. And way that I

15 knew that she was there was because the next

16 day my grandson called me, and he said that,

17 Denine said you acknowledged her last night.

18 Acknowledged her where? She was

19 at the vigil last night, Grandmom, and she said

20 you acknowledged her.

21 And I went on to explain to him

22 that it was cold outside. Everybody had on

23 hoods and everything, about 50 people out there

24 that were there for my son. So I pretty much

25 acknowledged everyone there. And I say that to

40

1 RENEE BLACKWELL

2 say that I didn't even recognize her.

3 Q. Okay.

4 A. So she's pretty much -- it

5 doesn't really matter how I feel about it. Not

6 a card of sympathy, just next day about Denine.

7 You understand what I'm saying?

8 I'm on Facebook. She's

9 contacted -- her and my son used to talk

10 regularly, I guess, through Facebook. All of

11 his friends are aware of the situation.

12 She hasn't given me any respect

13 and I think in the manner in which

14 this whole thing is going down.

15 Q. Okay. Where are you currently

16 employed? You said you work every day.

17 A. SimplexGrinnell.

18 Q. And what do you do for them?

19 A. I'm human resources, PMA

20 contractor.

21 Q. And I think that you have

22 been through a lot of things in your life

23 that are mental, emotional

24 things --

25 A. Yes.

41

1 RENEE BLACKWELL

2 Q. And is that -- also true that

3 you haven't seen a psychologist, psychiatrist,

4 social worker for these issues as well?

5 A. No.

6 Q. With Denine coming to the vigil,

7 to your mother's house, those issues, to your

8 knowledge, has she been invited to all of those

9 places by some member of your family?

10 A. Oh, yes. Oh, yeah. She -- I --

11 yes.

12 Q. Have you done any research

13 yourself into the New Jersey laws regarding the

14 adoption registry?

15 A. No.

16 Q. Have you any information that

17 anyone from DYFS acted other than in accordance

18 with the laws of New Jersey?

19 A. Do I have any information that

20 anyone from DYFS --

21 Q. Right. That either Ms. Helb,

22 Ms. Parnes, or any of those people that you

23 have sued -- that they acted other than in

24 compliance with the laws of the State of

25 New Jersey?

11 (Pages 38 to 41)

<p style="text-align: right;">46</p> <p>1 RENEE BLACKWELL</p> <p>2 INSTRUCTIONS TO WITNESS</p> <p>3 Please read your deposition over</p> <p>4 carefully and make any necessary corrections.</p> <p>5 You should state the reason in the appropriate</p> <p>6 space on the errata sheet for any corrections</p> <p>7 that are made.</p> <p>8 After doing so, please sign the</p> <p>9 errata sheet and date it.</p> <p>10 You are signing same subject to</p> <p>11 the changes you have noted on the errata sheet,</p> <p>12 which will be attached to your deposition.</p> <p>13 It is imperative that you return</p> <p>14 the original errata sheet to the deposing</p> <p>15 attorney within thirty (30) days of receipt of</p> <p>16 the deposition transcript by you. If you fail</p> <p>17 to do so, the deposition transcript may be</p> <p>18 deemed to be accurate and may be used in court.</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">48</p> <p>1 RENEE BLACKWELL</p> <p>2 ACKNOWLEDGMENT OF DEPONENT</p> <p>3 I, _____, do hereby</p> <p>4 certify that I have read the foregoing pages</p> <p>5 ____ to ____ and that the same is a correct</p> <p>6 transcription of the answers given by me to the</p> <p>7 questions therein propounded, except for the</p> <p>8 corrections or changes in form or substance, if</p> <p>9 any, noted in the attached Errata Sheet.</p> <p>10 _____</p> <p>11 DATE SIGNATURE</p> <p>12</p> <p>13 Subscribed and sworn to before me this</p> <p>14 _____ day of _____,</p> <p>15 2010.</p> <p>16 My commission expires: _____</p> <p>17</p> <p>18</p> <p>19 _____</p> <p>20 Notary Public</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p style="text-align: right;">47</p> <p>1 RENEE BLACKWELL</p> <p>2 -----</p> <p>3 E R R A T A</p> <p>4 -----</p> <p>5 PAGE LINE CHANGE</p> <p>6 -----</p> <p>7 -----</p> <p>8 -----</p> <p>9 -----</p> <p>10 -----</p> <p>11 -----</p> <p>12 -----</p> <p>13 -----</p> <p>14 -----</p> <p>15 -----</p> <p>16 -----</p> <p>17 -----</p> <p>18 -----</p> <p>19 -----</p> <p>20 -----</p> <p>21 -----</p> <p>22 -----</p> <p>23 -----</p> <p>24 -----</p> <p>25 -----</p>	

13 (Pages 46 to 48)